

SB INITIATIVE, INC. a 501(c)(3) Organization)	
)	
Plaintiff/Counter-Defendant,)	
v.)	
)	Docket No. 3:24-cv-821
CHEEKWOOD BOTANICAL GARDEN)	DISTRICT JUDGE ELI J.
AND MUSEUM OF ART, a 501(c)(3))	RICHARDSON
Organization)	MAGISTRATE JUDGE
)	BARBARA D. HOLMES
Defendant/Counter-Plaintiff.)	

Plaintiff SB Initiative, Inc. (“SBI”) hereby provides the following supplemental documents in support of its Response and Sur-Reply to Defendant Cheekwood Botanical Garden and Museum of Art (“Cheekwood”)’s Motion, as follows:

- Exhibit 1: Statement of Dori Waller, The Social Office, Event Designer/Coordinator for the Swan Ball Gala 2017-2019, 2024, with attachments: The Social Office/Swan Ball Contract for 2024, 2024 Sequence of Events.
- Exhibit 2: Statement of Karen Casey, Production/Project Manager for the Swan Ball Gala for 12 years, 1998-2009.

- Exhibit 3: Statement of Saramae Carroll, Colleague of Jim Mees, Swan Ball Gala Event Designer for 11 Years.
- Exhibit 4: Statement of Linda Mason, Co-Chair of the Swan Ball Gala in 1992.

Counsel continues to anticipate filing the Statement of Carole Sergeant, Co-Chair of the Swan Ball Gala in 1997 with Josephine Darwin. Mrs. Sergeant has been unable to sign due to unforeseen exigent circumstances. Counsel would call attention to the fact that Mrs. Darwin's Statement is contradicted by Cheekwood's then Director of Development, Ms. Martha Flanagan.

Respectfully submitted,

/s/ Chanelle Acheson
Chanelle Acheson
Attorney for Plaintiff/Counter-Defendant
Waddey Acheson, LLC
1030 16th Ave S.
Floor 3, Suite 300
Nashville, TN 37212
chanelle@waddeyacheson.com
Bar # 30008

Jack Waddey
Waddey Acheson, LLC
Attorney for Plaintiff/Counter-Defendant
1030 16th Ave S.
Floor 3, Suite 300
Nashville, TN 37212
Jack@waddeyacheson.com
Bar # 00002665

CERTIFICATE OF SERVICE

I hereby certify that on September 11 2024 a copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Maia Woodhouse
Adams & Reese
1600 West End Avenue
#1400
Nashville, TN 37203

/s/ Chanelle Acheson

Chanelle Acheson
Attorney for Plaintiff/Counter-Defendant
Waddey Acheson, LLC
1030 16th Ave S.
Floor 3, Suite 300
Nashville, TN 37212
chanelle@waddeyacheson.com